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European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

46th Session

Nanjing, China, 5 – 10 May 2014

AGENDA ITEM 12

Establishment of Codex Priority List of Pesticides

(CX/PR 14/46/13)

European Union Competence

European Union Vote

The European Union (EU) would like to thank Australia for the preparation of the document on the establishment of the Codex schedules and priority lists of pesticides and wishes to provide the following comments:

1) The EU fully supports the proposed inclusion of the following four substances in the list of compounds scheduled for periodic review in 2018:

Code No.	Substance	Rationale
47	Bromide ion	Review in 1988, more than 20 years ago. When reviewing natural background levels need to be taken into account.
51	Methidathion	An ARfD was set in the tox. re-evaluation by JMPR in 1997. No periodic review took place since then. Using this ARfD, the European Food Safety Authority (EFSA) identified exceedances of this ARfD for citrus fruits. Also the ADI was exceeded for 25 European diets with citrus fruits, olives for oil production and milk being the main contributors.
70	Bromopropylate	No ARfD was set in 1993 when the substance was reviewed by JMPR. The EFSA assessed the substance using the ADI and identified exceedances for citrus fruit, pome fruits, table and wine grapes. Highest chronic exposure for the

		German child was 124% of the ADI. Since there were no supervised field trials complying with the critical GAP or reliable processing studies the intake could not be further refined.
192	Fenarimol	No ARfD was set by JMPR in 1995. The ADI was set at 0.01 mg/kg bw/d. In the EU an ARfD of 0.02 mg/kg bw/d was established in 1997. Exceedances of the ARfD were identified by EFSA for children with peppers, peaches, apples, tomatoes, pears and bananas.

2) In addition the EU proposes three additional substances for inclusion into the 2018 schedule for periodic review:

Code No.	Substance	Rationale
246	Acetamiprid	Although acetamiprid was quite recently reviewed by JMRR (2011), there are new toxicological data on development neurotoxicity which may lead to a lowering of the current ARfD (0.1 mg/kg bw). EFSA, in its reasoned opinion on developmental neurotoxicity of acetamiprid and imidacloprid (December 2013) recommends a 4 times lower ARfD of 0.025 mg/kg bw. With such a lowered ARfD, the CXLs for apple, chard and citrus fruit would be of concern.
27	Dimethoate	In the 2003 evaluation by JMPR an ARfD was established. However, in the exposure assessment for the acute risk the highest residue was not used in the case of citrus. Using the HR would lead to an exceedance of the ARfD of 230% (see also agenda point 7 – Discussion paper on kumquat prepared by Japan). Furthermore, the CXL of 2 mg/kg for cherries leads to an unacceptable acute risk for children and should be revised.

35	Ethoxyquin	<p>The substance is not authorised in the EU and no import tolerances exist. EFSA concluded that the metabolism data used by JMPR for establishing the residue definition for enforcement and risk assessment could not be confirmed as the metabolism data showed deficiencies using the JMPR residue definition. EFSA concluded that the CXL for pears exceeded the ARfD (109%) and proposed to lower the EU MRL to the LOD.</p> <p>The last full residue evaluation was performed by JMPR in 1999.</p>
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3) Furthermore, the EU proposes to **withdraw the CXLs** for **tolyfluanid** (No. 162) since the substance is no longer supported worldwide. Tolyfluanid is already listed in Table 4 "Chemical-commodity combinations for which specific GAP is no longer supported".